

## **EXHIBIT “4”**

1

UNITED STATES DISTRICT COURT

EASTERN DISTRICT OF NEW YORK

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GOVERNMENT EMPLOYEES INSURANCE CO., ET AL.

Plaintiff,

Case No.

1:20-cv-01214 (RRM) (SMG)

-against-

NORTHERN MEDICAL CARE, P.C., ET AL.

Defendant.

- - - - - x

VIA VIDEO CONFERENCE

THE STATE OF NEW YORK

December 03, 2020

12:01 p.m.

DEPOSITION of ALLA KURATOVA, the Non-Party Witness, by the Plaintiff, in the above-entitled action, held at the above time and place, pursuant to Subpoena, taken before JENNIFER SIMMONS, a shorthand reporter and Notary Public within and for the State of New York.



1

**KURATOVA**

7

2 Q. Okay. What is your current status  
3 here in the United States?

4 **A. The same. I have a green card.**

5 Q. Ms. Kuratova, have you ever been  
6 convicted of a crime?

7 **A. Yes.**

8 Q. What crime?

9 **A. I don't know how to explain. In '15 I**  
10 **pleaded guilty, felony B. I was not arrested and**  
11 **I had a three year conditional discharge, so it's**  
12 **over now.**

13 Q. What were you accused of doing?

14 **A. I was accused of possessing some**  
15 **medications. I've been using them for 10 years.**

16 Q. Ms. Kuratova, are you represented by  
17 an attorney?

18 **A. Kuratova, Kuratova. (Pronouncing)**

19 Q. Okay.

20 **A. I don't know. I have a lawyer, but I**  
21 **don't know whether he's working right now.**

22 Q. Are you prepared to go forward with  
23 this deposition right now?

24 **A. What do you call a deposition?**

25 Q. This proceeding. Are you prepared to



2 answer my questions?

3 **A. I am ready to answer your questions.**

4 Q. Okay. Have you ever heard of a  
5 company called Northern Medical Care, PC?

6 **A. No.**

7 Q. All right. Are you familiar with a  
8 person named Dr. Omar Ahmed, A-H-M-E-D?

9 **A. No. I have two doctors whose last**  
10 **names I can just pronounce for you.**

11 Q. Who are they?

12 **A. My family doctor and the cardiologist.**

13 Q. Do you know their names?

14 **A. Dr. Radcliff and Dr. Birken.**

15 Q. All right. Do you know someone named  
16 Howard Greenleaf?

17 **A. No.**

18 Q. Do you know someone named Sam Timmat,  
19 T-I-M-M-A-T?

20 **A. No.**

21 Q. Do you know someone named Neil Laster,  
22 L-A-S-T-E-R?

23 **A. No.**

24 Q. Do you know someone named Mary Recaro,  
25 R-E-C-A-R-O?



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**KURATOVA**

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2

THE INTERPRETER: Sorry, I clarified

3

something. Because in the beginning she

4

said the same office with breaks.

5

BY MR. HENESY:

6

Q. Do you currently live with anyone?

7

**A. My mother.**

8

Q. Anyone else?

9

**A. No.**

10

Q. Besides working as a home attendant do

11

you do anything else to get money or income?

12

**A. No.**

13

Q. All right. Have you ever been to a

14

check cashing -- withdrawn.

15

Have you ever been to a check casher in

16

the state of New Jersey? [Sic]

17

**A. No.**

18

Q. Okay. Have you ever been to any

19

business or any -- withdrawn.

20

Have you ever been to anything located at

21

6 Market Street, Clifton, New Jersey?

22

**A. No. But, yes, I was in Clifton two or**

23

**three years ago at the wedding of my niece.**

24

Q. Okay. Besides being in Clifton for

25

your niece's wedding, have you ever been to



2 Clifton, New Jersey?

3 **A. No.**

4 Q. Have you ever taken a check to a check  
5 cashier on behalf of a doctor or medical practice?

6 **A. No.**

7 Q. Do you know someone named Jerome Reed?

8 **A. No.**

9 Q. Are you familiar with a company called  
10 United Check Cashing?

11 **A. No.**

12 Q. Okay. GEICO has received information  
13 indicating that you presented checks issued to  
14 Northern Medical Care to a check cashier in  
15 Clifton, New Jersey. Is that true?

16 **A. No.**

17 Q. Have you ever presented -- withdrawn.  
18 GEICO was provided a copy of your  
19 driver's license by the owner of a check cashing  
20 company in New Jersey. Do you have any reason to  
21 know why a check cashier in New Jersey would have  
22 a copy of your driver's license?

23 **A. GEICO used to be my insurance. My**  
24 **vehicle was insured by GEICO before, maybe five**  
25 **or six years ago -- no. The car was registered**

